

Comments on the substance of the Manomet study and its implications for policy are being officially accepted through July 9, but the Department is clearly not interested in what these comments may say. The press release that accompanied release of the study, together with the policy decisions released prior to the July 9 comment deadline, indicate a blatant and cynical indifference to what the public might say, as well as hostility to any serious effort to interpret the study's findings.

The announced changes in policy would be justifiable only if there were unambiguous evidence that existing policy and incentives were catastrophically flawed, requiring drastic action. The Manomet study, limited in scope and certainly subject to a variety of interpretations, does nothing to undermine the concept of biomass carbon neutrality and the basis for current renewable energy policy. DOER/EOEEA has no basis for changing the rules under which renewable energy project developers have invested millions of dollars under a set of rules and permitting procedures. The Manomet study really does not upset underlying fundamental science. The Secretariat is simply using it to justify policy changes that are best interpreted as politically expedient.

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